

**DATA REQUEST OF COMMISSION STAFF TO AT&T BROADBAND PHONE OF KENTUCKY, LLC
 (“COMCAST PHONE”) DATED 10/21/03
 STATE OF KENTUCKY**

KENTUCKY PUBLIC SERVICE COMMISSION

RE: Docket No. 2003-00347

Docket No.: 2003-00347
 Date: November 5, 2003

Answered and Averred By: David Sered,
 Director, Regulatory Affairs

	Question	Response
Kentucky	<p>1. a. The total number of high-capacity (DS1 or greater) circuits that are (i) provided at retail to end-users; and (ii) supplied on a wholesale basis to CLECs for resale. b. The total number of high-capacity (DS1 or greater) unbundled network elements loops (UNE-L) leased by all CLECs. c. The total number of high-capacity (DS1 or greater) UNE-L combined with UNE switching (UNE-P) leased by all CLECs.</p>	<p>Not applicable. Data Request No. 1 is directed only to BellSouth Telecommunications, Inc., ALLTEL of Kentucky, and Cincinnati Bell Telephone Company.</p>
Kentucky	<p>2. Every CLEC party that owns or controls local switching facilities used to provide high-capacity (DS1 or greater) circuits in Kentucky shall report, for each wirecenter in its Kentucky service territory, the total number of high-capacity (DS1 or greater) circuits that are (1) provided at retail to end-users or (2) supplied on a wholesale basis to other CLECs. The information requested shall be provided in a tabular format and contain, at a minimum, the following elements: (1) wirecenter CLLI code, (2) wirecenter/location name, and (3) exchange name.</p>	<p>AT&T Broadband Phone of Kentucky, a Comcast company, hereinafter “Comcast Phone,” objects to this Request on the grounds that it is unduly burdensome. In particular, the request for information by ILEC “wirecenter” is unduly burdensome because Comcast Phone, which is a facilities-based provider, does not maintain information by “ILEC wire center.” Subject to and without waiving the foregoing general and specific objections, Comcast Phone responds as follows:</p> <p>(1) Comcast Phone does not offer high-capacity circuits</p>

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		<p>using local switching facilities, as defined in IR 2, to retail end-users.</p> <p>(2) Comcast Phone does not offer high-capacity circuits using local switching facilities, as defined in IR 2, on a wholesale basis to other CLECs.</p>
Kentucky	<p>3. The ILEC parties and CLEC parties shall provide the following:</p> <p>a. The aggregated annual including annualized revenues for new customer accounts of less than one year) revenues generated from all customer accounts by wirecenter in the service area must be identified for those customers utilizing high-capacity switch (DS1 and higher) services. In calculating revenues, if there are revenues flowing to affiliated companies for other services such as wireless, data, or Internet provision, identify and include these revenues in the aggregate revenue calculation for 2001, 2002 and year-to-date 2003.</p> <p>b. The annual revenue generated by the smallest (in terms of revenue and in number of lines) DS1 service customer account in each wirecenter in 2002 and year-to-date 2003.</p> <p>c. The number of DS1 service customer accounts and the aggregate revenue in each wirecenter which has been lost</p>	<p>AT&T Broadband Phone of Kentucky, a Comcast company, hereinafter “Comcast Phone,” objects to this Request on the grounds that it is unduly burdensome. In particular, the request for information by ILEC “wirecenter” is unduly burdensome because Comcast Phone, which is a facilities-based provider, does not maintain information by “ILEC wire center.” Subject to and without waiving the foregoing general and specific objections, Comcast Phone responds as follows:</p> <p>a. – e. Not applicable. Comcast Phone does not provide customers with the services using a high-capacity switch that are the subject of these subparts.</p>

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	<p>to competitors in 2001, 2002 and yearto- date 2003.</p> <p>d. The identity of known companies competing for DS1 service customers in each wirecenter for 2001, 2002 and year-to-date 2003.</p> <p>e. The guidelines used by sales representatives servicing DS1 customer accounts to identify and acquire new customer accounts.</p> <p>f. The threshold criteria that define and characterize a customer who would benefit from either initially subscribing to DS1 services (new/start-up) or upgrading existing services to DS1 services.</p>	
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